

**DECLARATION OF
JEAN-CHARLES BRISARD**

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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**IN RE TERRORIST ATTACKS ON
SEPTEMBER 11, 2001**

**Civil Action No.
03 MDL 1570 (RCC)**

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This document relates to:

Ashton v. Al Qaeda Islamic Army, 02-CV-6977 (RCC)
Federal Ins. v. Al Qaida, 03-CV-6978 (RCC)
World Trade Center Properties v. Al Baraka, No. 04-CV-7280 (RCC)
Continental Cas. Co. v. Al Qaeda, 04-CV-5970 (RCC)
Euro Brokers v. Al Baraka, No. 04-CV-7279 (RCC)
New York Marine & General Ins. Co. v. Al Qaida, 04-CV-6105 (RCC)
Burnett v. Al Baraka, No. 03-CV-5738 (RCC)

DECLARATION OF JEAN-CHARLES BRISARD

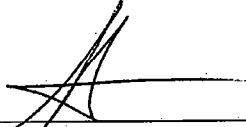
Jean-Charles Brisard declares under penalty of perjury:

1. I am a consultant offering expertise and analysis to various governmental and non-governmental clients on issues relating to Al-Qaeda and international terrorism. I am a doctor in international law and former assistant to the French antiterrorist chief prosecutor. I started studying the Al Qaeda financial network for the French intelligence community in 1997. In the past, I have testified as an expert witness on terrorism and the financing of Al Qaeda. I also testified before the United States Congress on this issue.
2. I testify that in 2005, I obtained information from a former employee of and advisor to Bakr Bin Laden.
3. I testify that this person provided information regarding the involvement of Bakr Bin Laden, as leader of the Bin Laden family and its network of companies, in protecting Osama Bin Laden from 1994 until at least 2005.

4. The former employee and advisor to Bakr Bin Laden, who attended or was a direct witness of several meetings related to the protection of Osama Bin Laden, stated that after Osama Bin Laden was forced to leave the Kingdom in 1991 due to his Islamic militant activities, Bakr Bin Laden and Khalid Bin Mahfouz, intervened before Prince Nayef and Prince Sultan to ensure that Osama Bin Laden's business and financial interests would remain untouched.
5. The former employee and advisor to Bakr Bin Laden further testified that the internal protection secured by Khalid bin Mahfouz and Bakr Bin Laden from the Saudi royal family enabled Osama bin Laden to transfer tens of millions of dollars in Saudi-based assets to Sudan to finance the construction and maintenance of terrorist training camps and to carry out attacks on U.S. interests as early as 1992.
6. He further testified that by the late 1990s, the Bin Laden family moved much of its financial support for Osama Bin Laden and al Qaeda to secret bank accounts in the Kingdom of Saudi Arabia and Switzerland. It directed funds to these accounts via a network of shell corporations and affiliated accounts in off-shore tax havens such as the Bahamas and the Cayman Islands.
7. The former employee and advisor to Bakr Bin Laden also gave details on how Bakr, Omar, Tarek Bin Laden collaborated with their brother Yeslam Bin Laden to activate an international network of couriers and intermediaries who moved money between the Middle East and al Qaeda operations in Afghanistan, Pakistan, Bosnia, and Chechnya via banks such as National Commercial Bank and Al Rajhi Banking and Investment.

I hereby declare under penalty of perjury in the United States that the foregoing is true and correct.

Executed on April 18, 2006.



Jean-Charles Brisard